

INTERNATIONAL MILITARY TRIBUNAL
FOR THE FAR EAST

Paper No. 737

- 1 -

THE UNITED STATES OF AMERICA, et al

- vs -

ARAKI, Sadao, et al.

- DEFENDANTS -

REQUEST FOR PRODUCTION OF WITNESSES

NOW COMES TOJO, HIDEKI and other defendants, by counsel of record, and respectfully request the Tribunal, in accordance with Section 3, Article 9, Paragraph 3 of the Charter and pursuant to order of the Tribunal, dated at Tokyo, Japan on the 24th day of October, paper bearing No. 492 to order the production of the following witnesses for their joint defense. All these witnesses have furnished affidavits or statements.

1. FUJITA, Tsuguo - Shimizu-Cho, Suginami-Ku, Tokyo.
 - a. The nationality of the witness is Japanese
 - b. This witness will testify to the precise relationships between the Japanese Government under the Constitution and the military organization.
2. MITARAI, Tatsuo - Ohara-Cho, Chiba Prefecture (in front of railroad station)
 - a. The nationality of the witness is Japanese
 - b. He will testify with reference to the composition of 15 Cabinets since 1928 and the cause of the fall of each such Cabinet.
3. OKADA, Tadahiko - Naka-Cho, Azabau-Ku, Tokyo.
 - a. The nationality of the witness is Japanese

- b. He will testify to the operation of the Japanese constitution, the manner of the formation of cabinets, the formation and activities of political organizations and other important internal circumstances.
- 4. TAMURA, Kosaku, No. 1123 Kitazawa, 1 Chome, Setagaya-Ku, Tokyo.
 - a. The nationality of the witness is Japanese
 - b. He will testify on the universal aspirations of the Japanese people and the cardinal principles of Japanese diplomacy.
- 5. WAGATA, Yoshitada - No. 3 Kuki Zushi-Cho, City of Kanagawa.
 - a. The nationality of the witness is Japanese
 - b. This witness will testify as to the origin and meaning of the moving picture "Japan in Time of Emergency".
- 6. MURATA, Shozo - Sugamo Prison
 - a. The nationality of the witness is Japanese
 - b. He will be able to testify regarding circumstances preparatory to the "Greater East Asia Conferences of 1943" and the conditions under which the various representatives attended the conferences.
- 7. YAMAMOTO, Kuniichi - No. 7 Shimo-Ura, 3 Chome, Setagaya-Ku, Tokyo.
 - a. The nationality of the witness is Japanese
 - b. He will be able to testify as to the origin and nature of "Greater East Asia Conferences" and that the speeches delivered were given freely and without compulsion.
- 8. INOUE, Takamaro - Zushi in the City of Yokosuka, Japan.
 - a. The nationality of the witness is Japanese
 - b. He will testify as to the true meaning of "Ko-do" and "Hakko-Ichiu" and their application.
- 9. TSUGITA, Daisaburo - No. 41 Otsuka, Naka-Cho, Koishikawa, Ku, Tokyo.
 - a. The nationality of the witness is Japanese
 - b. He will testify regarding the Imperial Ordinances relative to the selection of War and Navy ministers.

10. ANDO, Kisaburo - Sugamo Prison

- a. The nationality of the witness is Japanese
- b. He will testify as to the formation and purpose of the Imperial Rule Assistance Association.

It is respectfully represented that all or most of the above named witnesses were requested under Paper No. 567, and that as they will be called to testify in Division I of the Defense that subpoenas be issued immediately for their production.

Submitted this 24th day of February 1947

TOJO, HIDEKI

By his Counsel

/s/KIyose, Ichiro
KIYOSE, ICHIRO

/s/George Francis Blewett
GEORGE FRANCIS BLEWETT